REMARKS

Claim 1 calls for a "storage error corrector." Thus, the corrector must correct storage errors. The claim is explicit that the storage errors are "a different predetermined storage error of data stored in the memory." Thus, the storage error corrector must, necessarily, be able to correct errors in the data stored in a storage.

The cited reference to Pittelkow has absolutely nothing to do with correcting storage errors or, for that matter, storage errors whatsoever. The office action relies on the failure managers, but the failure managers are explained in some detail, starting in column 23, line 65. These failure managers simply detect when one of the controllers 201 fails. The failure of the controller has nothing to do with storage errors on data stored in a memory and the Pittelkow reference is completely irrelevant.

Moreover, even when a controller fails, there is no correction of any storage error. All the failure manager does is report the failures to the resource manager. See column 24, lines 16-23.

Slave failure managers 302 discover data link errors. See column 25, lines 1-5. A data link error cannot in any way be said to correspond to a storage error, nor in any way correspond to actually correcting, as exposed to merely detecting, such an error.

The reference is not reasonably pertinent since all it does is determine when controllers fail. It does not handle the situation where there is an error in the data stored in the memory. That is because detecting controller failures does not correspond to correcting storage errors of data stored in the memory.

Therefore, reconsideration of claim 1 is respectfully requested.

Claim 9 is even more explicit. It calls for storing data in a non-volatile solid-state memory, the data having at least one storage error of a plurality of storage error types. Thus, what is referred to explicitly is the data stored in the non-volatile solid-state memory. Pittelkow has nothing to do with such a system. He does not detect data storage errors in solid-state memories and he does not correct such errors.

Similarly, the rejection of claims 17, 19, and 21 should be reconsidered.

The mere fact that Pittelkow shows an NVRAM and a disk storage does not have anything to do with teaching correcting data errors in such an NVRAM. A disk storage has nothing to do with a solid-state memory. The fact that solid-state drives are known gives one no inclination of

why to use a reference which teaches handling, but not correcting, controller failures to correct errors in the data stored on a solid-state memory. The rejection is untenable and should be withdrawn.

Respectfully submitted,

Date: January 30, 2009

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